

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS, INC.,

Plaintiff,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT,

Defendant.

No. 1:22-cv-10407-PBS

**ASSENTED-TO MOTION FOR AN EXTENSION OF TIME AND TO AMEND THE
SCHEDULING ORDER**

Plaintiff moves for a one-week extension of its deadline to oppose Defendant's summary judgment motion and file a cross-motion for summary judgment, and for a corresponding amendment of the current briefing schedule. Plaintiff's counsel is working diligently on Plaintiff's submission. But due to unforeseen circumstances, travel, and competing responsibilities in other cases, Plaintiff would benefit from additional time to prepare its submission. Defendant assents to this motion.

Defendant's summary judgment motion was filed on November 17. The proposed modified briefing deadlines are:

- Plaintiff's opposition and cross-motion for summary judgment: December 22, 2022 (currently December 15, 2022)
- Defendant's opposition: January 12, 2023 (currently January 5, 2023)
- Plaintiff's reply: February 2, 2023 (currently January 26, 2023)

Respectfully submitted,

Date: December 13, 2022

/s/ Adriana Lafaille

Matthew R. Segal (BBO #654489)

Adriana Lafaille (BBO# 680210)

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*Leave to appear *pro hac vice* granted;

Notice of Appearance forthcoming

Local Rule 7.1 Certification

I certify that I have conferred with counsel for the Defendant regarding this motion. The Defendant assents.

/s/ Adriana Lafaille

Adriana Lafaille